

EXHIBIT A

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
CIVIL ACTION NO. 1:19-CV-10482-WGY

~~~~~  
ALLAN CHIOCCA,  
Plaintiff,

v.

TOWN OF ROCKLAND, DEIRDRE HALL,  
EDWARD KIMBALL, LARRY RYAN,  
MICHAEL MULLEN, JR., MICHAEL  
O'LOUGHLIN, RICHARD PENNEY and  
KARA NYMAN,  
Defendants.

~~~~~  
DEPOSITION OF REGINA RYAN, ESQUIRE
OCTOBER 6, 2021
10:13 A.M.

BURNS & LEVINSON, LLP
125 HIGH STREET
BOSTON, MASSACHUSETTS

Job #33873

REPORTER: TRACY COFFMAN

EcoScribe Solutions

www.EcoScribeSolutions.com

888.651.0505



ALLAN CHIOCCA vs TOWN OF ROCKLAND
Regina Ryan October 06, 2021

Job 33873
Page 37

1 don't remember the word bragging. I don't
2 remember the word victim.

3 And I don't remember, I don't think
4 I heard climaxing so.

5 Q. Given the somewhat delicate issues in the
6 matter --

7 A. Yes.

8 Q. -- that Mr. Chiocca would've called Mr.
9 Clifford on the Saturday after being
10 confronted privately to brag that he had
11 climaxed, that could have been very material
12 in your consideration of matters before you,
13 isn't that right?

14 A. If I had known that?

15 Q. Yes.

16 A. Would that have been a fact I would have
17 considered?

18 Q. Yes.

19 A. I would've considered that.

20 Q. And it could've affected the outcome of this
21 case, correct?

22 A. It could have.

23 Q. Now were you ever aware that Mr. Clifford, in
24 his conversation with Mr. Chiocca on the

ALLAN CHIOCCA vs TOWN OF ROCKLAND
Regina Ryan October 06, 2021

Job 33873
Page 55

1 left at 11:00 and five glasses of wine had
2 been ordered for Ms. Hall, that may have been
3 material to your analysis of what was going
4 on, right?

5 A. Right, because I -- she represented, I don't
6 think she represented that she had five
7 glasses of wine.

8 Q. She represented that she couldn't remember,
9 right?

10 A. I thought she represented that she had two to
11 three.

12 Q. Well, looking at this receipt, that may have
13 been material?

14 A. It could've been.

15 Q. And had you had the receipts, given Ms. Hall
16 telling you that she was having trouble with
17 her memory, you could have shown them to her,
18 right?

19 A. If I had these, yes.

20 Q. And you could have asked Mr. Chiocca why his
21 signature was on both bills and what that
22 said about the level of drinking that was
23 going on, right?

24 A. Yes.

ALLAN CHIOCCA vs TOWN OF ROCKLAND
Regina Ryan October 06, 2021

Job 33873
Page 56

1 Q. Right?

2 A. I could've, yes.

3 Q. And you would agree that knowing -- by the
4 way, if you had known that Ms. Hall had
5 consumed five glasses of wine, or at least
6 the receipts suggests that perhaps she had,
7 that could've been material to your findings,
8 right?

9 A. That could've been.

10 Q. And you didn't have subpoena power so you
11 couldn't do what Cindy did, which is to
12 require the RGB to give you the receipts,
13 right?

14 A. Correct.

15 Q. And so knowing that level of wine consumption
16 may have affected the way you viewed events
17 on that evening?

18 A. I could've considered it.

19 Q. And it may have affected the outcome of your
20 consideration, right?

21 A. It could've.

22 Q. Now were you aware that Ms. Hall also takes
23 medication?

24 A. I remember her talking about pills falling

1 with the evidence that I had, I came to these
2 conclusions.

3 Q. Okay, and you understood that there were
4 facts about that evening that were not
5 available to you, either because Ms. Hall's
6 memory was not complete or, as you learned
7 today, certain witnesses may not have been
8 available to you or forthcoming in their
9 presentation, is that fair?

10 MR. SHAFRAN: Objection.

11 A. It's fair to say that there's definitely more
12 information, that I was not made aware of,
13 about what happened that night that may have
14 been disclosed through discovery.

15 Q. And given that, the limitations of your
16 investigation that were just, you know, you
17 didn't have ability to put people under oath,
18 you didn't have the ability to subpoena
19 documents.

20 Mr. Chiocca, who would've had those
21 receipts because it's his credit card, didn't
22 give you both receipts, right?

23 A. I did not have both receipts, that is
24 correct.

ALLAN CHIOCCA vs TOWN OF ROCKLAND
Regina Ryan October 06, 2021

Job 33873
Page 76

1 Q. He didn't provide them to you?

2 A. Correct.

3 Q. And had you had that information, it may have
4 affected where you landed in your internal
5 investigation, correct?

6 MR. SHAFRAN: Objection, asked and
7 answered.

8 A. It could've. The receipts offered more
9 information about -- it would've given me, I
10 would've asked more questions.

11 Because I don't think I knew that
12 he, there were four ultras (sic) ordered or
13 five ultras ordered. It was my understanding
14 that he hadn't had that much alcohol.

15 These would've led me to ask more
16 questions and make further inquiry of both
17 parties and it could have impacted my
18 findings.

19 Q. And it may have affected your assessment of
20 Mr. Chiocca's credibility, right?

21 A. It could've.

22 Q. Now it is also the case that for whatever
23 reason, experts in trauma, memory
24 intoxication, were not made available to you?

ALLAN CHIOCCA vs TOWN OF ROCKLAND
Regina Ryan October 06, 2021

Job 33873
Page 324

1 A. That could be correct.

2 Q. And we've seen that through the course of
3 this day, haven't we?

4 A. Yes.

5 Q. Is that right?

6 A. Yes.

7 Q. So you wouldn't want your notes ever to be
8 seen by a jury as a transcription of what
9 actually was said, right?

10 A. Yes.

11 Q. Because in fact we've caught today certain,
12 certain comments in your notes that you've
13 caught as perhaps not accurate, or as
14 confusing, right?

15 A. What was not accurate?

16 Q. Well, remember you said --

17 A. There was one that.

18 Q. An important one, Ms. Hall indicating that
19 she was, it was not like her?

20 A. Correct.

21 Q. Right?

22 A. Yes.

23 Q. And so you would never want those notes to go
24 back and sit with a jury as something that

ALLAN CHIOCCA vs TOWN OF ROCKLAND
Regina Ryan October 06, 2021

Job 33873
Page 360

CERTIFICATE

Commonwealth of Massachusetts

Middlesex, SS.

I, Tracy Coffman, a Court Reporter
and Notary Public duly qualified in and for the
Commonwealth of Massachusetts, do hereby certify
that the witness whose deposition is hereinbefore
set forth, was duly sworn by me and that such
deposition is a true record of the testimony given
by the witness.

I further certify that I am neither
related to or employed by any of the parties in or
counsel to this action, nor am I financially
interested in the outcome of this action.

In witness whereof, I have hereunto
set my hand and seal this 12th day of October 2021.

Tracy Coffman

Tracy Coffman

Notary Public

My Commission Expires

July 31, 2026